

**STATEMENT FOR
THE RECORD BY
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AND
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NATIONAL ASSOCIATION OF STATE APPROVING AGENCIES
BEFORE THE
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY
COMMITTEE ON VETERANS AFFAIRS
UNITED STATES HOUSE OF REPRESENTATIVES
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INTRODUCTION

Chairwoman Herseth Sandlin, Ranking Member Boozman and members of the Subcommittee on Economic Opportunity, we are pleased to appear before you today on behalf of the National Association of State Approving Agencies to provide comments on the functions of State Approving Agencies (SAAs), the value added by SAAs, the issue of overlap in the work of various “approving agencies” and funding needed by SAAs to carry out their responsibilities.

BACKGROUND

State Approving Agencies recently celebrated sixty years of partnership with the U.S. Department of Veterans Affairs (DVA) in the administration of the veterans’ educational assistance programs, more commonly known as the GI Bill. Through the program approval and supervision process, they ensure that money spent on veterans education is money well spent, and assist in reducing the opportunities for fraud, waste and abuse.

In many ways the fundamental mission of State Approving Agencies (SAA) is the same today as it was when they were founded sixty years ago. State Approving Agencies:

- *promote and safeguard quality education and training programs for veterans;*
- *ensure greater educational and training opportunities to meet the changing needs of veterans; and*
- *assist the DVA in preventing fraud, waste and abuse in the administration of the GI Bill.*

As State entities acting on behalf of the Federal government, they have been an outstanding example of the workability of the Federal-State partnership, allowing Federal interests to be pursued at the local level while preserving the identity, interests and sovereignty of State’s rights in education.

Under Title 38, *United States Code*, each governor designates a state bureau or department as the State Approving Agency for the state. Today there are 59 State Approving Agencies (some states have two) with about 200 professional and support personnel, supervising over 10,000 active facilities with approximately 200,000 programs. Located in various state offices, including state departments of education, higher education boards, departments of labor, departments of veterans affairs and stand alone agencies -- SAA professionals bring a wealth of formal education, training and experience to the appraisal of programs for veterans benefits .

REMARKS

A. Functions – State Approving Agencies carry out their mission through their core functions of program approval, on-going contact and supervision, technical assistance, outreach, and liaison. As described below, each of these core functions continues to evolve as State Approving Agencies meet the challenge of a dynamic educational and training environment.

1. Program Approval - The appraisal process whereby SAAs determine whether new programs meet the requirements of law and are eligible for veterans' benefits.

Under federal law, there are a host of approval criteria designed to (a) facilitate the accurate and timely payment of benefits; (b) minimize erroneous payments and opportunities for fraud, waste, and abuse; and (c) ensure that tax dollars spent on veterans education and training are dollars well spent. Programs are required to meet acceptable standards regarding student progress; credit for prior learning; establishment of branch campuses; treatment of residencies; independent study and practicums; educational contracting; student record-keeping; program content; instructor expertise; sufficiency of facilities and equipment; and methods of instruction.

SAAs also focus on policy issues and practices which frequently lead to problems with non-compliance. SAAs are particularly concerned with branch campuses, educational contracting, distance education, high tech courses of short duration, adult education, and accelerated classes. Often, it is the systems and policies in place that receive SAA attention. This is in addition to a detailed examination of the curricular structure and faculty credentials. Much of this can be done during a visit to the school in conversation with various school officials and a review of student records.

- Total Program Approvals Actions (both approvals and disapprovals) rose 97% from FY 97 to FY 05 and Apprenticeship and On-The-Job Training program approvals rose 54% from 2,444 in FY 97 to 3,760 in FY 05.
- SAAs work with deficient programs to assist them to meet approval standards and therefore only about five percent of all program reviews result in disapproval.

2. On-going Contact and Supervision – General and continuing oversight of our institutions to verify continued compliance with federal requirements; to prevent fraud, waste and abuse; to offer training; and -- at the request of the VA -- to investigate and provide assistance with compliance/program issues.

Even at established schools and long-standing training programs, problems can crop up which will adversely affect the quality of the veteran's program or the amount of benefits paid. Pivotal to the protections the GI Bill affords its recipients is the on-going, on-site monitoring and supervision of institutions wishing to have their programs approved. In this regard there is no comparable association or agency which provides this level of proactivity. And this is why SAAs maintain their discretion to visit even highly regarded institutions.

In the course of an oversight and training visit to the school or training establishment, the SAA determines whether each of the programs continues to meet the approval requirements of Federal and State law. Just as importantly the SAA assist the school/facility in maintaining continued compliance.

An Oversight and Training Visit usually includes:

- A review of institutional policies and practices affected by the regulations. SAAs make note of changes to programs, facilities, ownership, off-campus offerings, internship policies, contracts with other training providers, transfer credit and the like. If a policy is not in accordance with the requirements of the regulations, SAAs often are able to negotiate a special policy for veterans or assist with the development of a general, school-wide policy that is in compliance.
- An investigation of the systems in place to carry out these policies. The SAA looks at such questions as: Is the school certifying official in a position to know about changes in a veteran's status? Are veterans being certified only for those courses that lead towards their educational, vocational or professional objective? Has the veteran's prior learning been evaluated and the veteran been notified of transfer or other credit which actually applies towards their degree? How quickly is the VA notified of a veteran's change in status? (For example, withdrawal from school or a change in programs).
- An examination of school and student records to verify that institutional policies are being enforced and that the required system of records is in place. SAAs also review veteran's records to ensure that veterans are being certified correctly and that the VA is not making payments based on erroneous information. This activity may save the veteran from having to return funds because of an overpayment when a problem is discovered on a compliance survey (audit) up to three years later. They also uncover evidence of inappropriate activity such as false and misleading advertisement.
- Visits also assist in the development of a good on-going relationship with school and training establishment officials. SAAs answer their questions, provide training, help them to problem-solve compliance issues, and encourage a greater sensitivity and awareness of veterans' benefits and needs. By nature of their job, SAAs have a broad overview of the education and training systems within the state. SAAs serve as consultants providing examples of best practices from other schools which interested schools can adopt.

SAAs also conduct Inspection Visits to new schools and programs to ensure that they can comply with approval requirements and are familiar with certification and reporting procedures.

- On-going Oversight and Training Visits to all schools and programs increased 30 % from 9,210 in FY 97 to 11,994 in FY 05.
- Inspection Visits to new schools and programs increased 25% from 2,362 in FY 97 to 2,955 in FY 05.

3. Technical Assistance – Assistance given to schools, training establishments and individuals regarding approval of programs and certification of veterans. Schools and veterans rely on SAAs for timely, on-the-spot information – answering a seemingly endless stream of questions.

SAAs render assistance to new schools seeking approval of their courses, employers looking to have their apprenticeship or other on-the-job training programs approved, veterans and their families, members of the reserve components, etc. SAAs answer questions about how to apply for approval or how to certify a veteran with a special problem. They answer questions about program length requirements, how to write a training agreement including appropriate wage scale and related instruction, questions about the requirements for practical training, contract courses and institutional record-keeping.

Further, the SAA serves as a facilitator between the school, the veteran and the VA. SAAs are arbitrators of complaints and the advocate for maximization of a veteran's benefits. They are often the *de facto* trainers of new school certifying officials and they keep the schools apprised of new developments, often holding regional workshops for school certifying officials.

- Total overall training/assistance actions increased 43% from 19,635 in FY 97 to 28,107 in FY 05.
- Training/assistance given to Apprenticeship/On-the-Job Training facilities rose from 7,359 in FY 97 to 8,959 in FY 05 and training/assistance actions for Institutions of Higher Education and Non College Degree schools rose from 12,001 in FY 97 to 18,588 in FY 05.

4. Outreach Activities – Efforts undertaken to reach out to various groups and promote the increased usage of veterans’ educational benefits. At the request of the DVA, State Approving Agencies are heavily engaged in outreach efforts to promote the usage of veterans’ educational benefits.

Some SAAs have developed radio spots, television videos and print advertising to encourage veterans to take advantage of the GI Bill and especially apprenticeship and on-the-job training programs. Other SAAs do “welcome home” mailings to newly separated veterans congratulating them on their service and informing them of their benefits and the educational/training opportunities available to them in their State. Many SAAs make presentations at military retirement seminars and the transition assistance programs (TAPS) for those leaving the service. SAAs participate in local military and veterans events; job fairs, welcome home activities, supermarkets of benefits and other venues where they can encourage the use of benefits. They work with their state’s departments of labor to assist veterans to find appropriate employment and training. In some states, the National Guard looks to the SAA approval in identifying programs eligible for national guard members to receive tuition support. Additionally, States have developed web sites allowing veterans to learn about their State and Federal benefits and to search for what programs and schools are approved and available in their state.

5. Liaison Activities – Coordination with government, veteran and educational entities to facilitate the approval of programs and increase educational opportunities for veterans. As State agencies working with a Federal program, SAAs are uniquely situated to network with stakeholders in education and training to coordinate the improved delivery of veterans’ benefits.

State Approving Agencies work with others to exchange information, facilitate the increased approval of programs and raise awareness of the veteran, their educational needs and benefits. SAAs have forged links with State Agencies such as Departments of Veterans Affairs, Departments of Education, Higher Education Governing Boards, Departments of Labor and other licensing boards. They meet with representatives of accreditation associations, the National Guard and the Reserves, apprenticeship councils, union boards, and military service organizations. Some SAA staff members also participate on accreditation visits. At a national level, contacts are made with the Departments of Defense, Education, Labor, and Agriculture, as well as the Federal Aviation Administration, and Federal Trade Commission.

State Approving Agency activities often complement what is being done at the state level and since not all states have program review offices, those SAAs become the *de facto* review entity for the State. SAAs often have ready access to information of value to program appraisal such as: a school’s audited financial statements; school evaluation reports; results of in-depth assessments in particular areas; program review by governing or coordinating boards; and, institutional statistics and research findings.

B. Added Value

In addition to the contributions stated in part **A. Functions**, State Approving Agencies help to ensure the success of the GI Bills by responding to new trends in education and training and by working with the DVA to take-on new challenges. As stated by a former Subcommittee Staff Director of the House Veterans Affairs Committee in an upcoming SAA outreach film – “**SAAs are the face of the GI Bill at the state level**”.

Frequent interaction with officials at all levels within the state provides understanding of how the system works which in turn creates a unique ability to assist Veterans in accomplishing their education and training objectives.

- Special attention has been and continues to be given to the request by Congress and the DVA to promote the development and approval of apprenticeship and on-the-job training programs. Extensive efforts have been made by SAAs to make employers and unions aware of this benefit and to assist them in having these programs promoted and approved. As a result, the number of active apprenticeship/on-the-job training (or OJT) facilities has increased over 100% in ten years from 2,086 (in 1997) to 4,891 (in 2006). New initiatives include the approval of preparatory courses, licensure and certification examinations, and entrepreneurship programs.
- SAAs have expanded their outreach efforts to promote increased usage of GI Bill benefits as described in the ***Outreach Activities*** section of part A of this testimony. In FY 97 SAAs conducted 12,724 outreach activities and in FY 05, 49,885. They continue to actively search for new ways to increase usage of the GI Bill and counsel veterans on available benefits and educational programs within their state.
- SAAs are directly involved with the new and emerging trends in education and training – ensuring their quality and availability for veterans. More and more distance education programs are now being approved. SAAs are reviewing and approving new short-term certification programs as illustrated by the growth in non-accredited NCD facilities and programs -- from 605 in FY 97 to 835 in FY 03, an increase of 38% percent. Also SAAs continue to evaluate accelerated degree programs, external degree offerings, new branch campuses and traditional colleges contracting with private occupational schools to provide training for college credit.
- SAAs also are directing more attention to promoting and insuring the evaluation and acceptance of credit for military training and experience.
- And for the benefit of veterans, other GI Bill eligible persons, and the DVA, SAA personnel participate in on-going professional development activities to ensure the availability of a wide range of quality learning experiences. The National Association of State Approving Agencies (NASAA) is in the process of completely updating its *National Training Curriculum* required under law. Training Institutes are held for new staff approximately every eighteen months. One was just held last week in Chicago where over 50 SAA and VA personnel participated. All national meetings have a professional development component designed to provide specialized, advanced training in leading edge developments in our field such as, distance education, state licensing, outreach techniques, DOD recruitment concerns, and approval of short term on-going professional development courses such as Microsoft and Novell.
- State Approving Agencies have been at the forefront of the enactment of many of the improvements to the various GI Bills. They have first hand insights into the education and training needs of veterans and are able to bring recommendations to members of Congress and the responsible committees. SAA personnel have had the honor and privilege of working with current and former members of Congress, including former Chairman Montgomery, to enact the Montgomery GI Bill (MGIB) and to expand program opportunities available under the law. Examples include the addition of apprenticeship and other on-the-job training (OJT) to Chapters 30 and 1606; non college degree and graduate programs to Chapter 1606; accelerated payments for high technology programs; increased benefit levels for apprenticeship and OJT participants; and revisions to the laws governing the approval of programs such as the period of operation rule, OJT wage requirements and pro rata refund policy.
- As founding member of the Partnership for Veterans Education, SAAs represented by their national association, is currently recommending the enactment of a Total Force MGIB that would simplify the administration of the law and bring equity to those who serve in defense of the freedoms that we all so thoroughly enjoy – equal program opportunity and benefits for equal service rendered. As you know Madame Chairwoman, this Subcommittee held an excellent hearing on the topic just a few weeks ago.

In short SAAs are the **face of the GI Bill at the state level.**

We provide:

- Veteran advocacy
- Outreach to Veterans
- Job training opportunity
- Consumer protection for Veterans entering education and training programs
- Assistance to Veteran who encounter problems at schools and training facilities
- Assistance with the prevention of waste, fraud and abuse

C. Overlap in the Work of Approving Agencies

Sixty years ago the Congress chose a path that has served the veteran and the taxpayer exceptionally well. Instituting a state level, program approval process to ensure the quality and integrity of the various learning experiences in which veterans engage and to assist the federal government in preventing waste, fraud and abuse has proven to be an excellent decision.

To the casual observer, it would appear that the work done by SAAs and that of the federal Departments of Education and Labor is similar, if not identical. A closer look reveals some stark distinctions, especially among “approval” activities for institutions and their programs.

Earlier pages of this testimony provided insights into the processes used by SAAs. To summarize, the SAA program approval process is:

- **Program oriented** – Certificate in Automotive Technology, Associate of Science in Nursing, Bachelor of Science in Biology, et al. In lay terms, an evaluation of the appropriateness of the program objective, what is being taught to achieve the objective, by whom, with what resources and under what circumstances. The latter category includes, for example, an evaluation of policies and practices pertaining to program admission, credit for prior learning, and satisfactory progress.
- **Built upon evaluations** by other state and private sector entities when appropriate; e.g., state licensing, degree granting authority, and accreditation (institutional and/or specialized/programmatic)
- On going **contact and monitoring** on an annual or bi-annual basis

Now let’s take a look at the process used by the Department of Education and, in particular, accreditation since this element of the DOE process seems to be the major focal point of the discussion about overlap.

The Departments of Education’s direct involvement in the administration of Title IV, Student Financial Aid programs is limited to (1) the authorization and reauthorization of an institution to participate in Title IV through an application process that is heavily dependent upon third parties and (2) compliance visits which are monetarily oriented, sporadic and generally conducted at an institution where there have been reported or perceived problems. Of the two third parties connected to the initial (and continuing) authorization, accreditation is perceived to be the one that actually attempts to ensure overall quality and integrity at the institutional level. The other activity, state licensing, has long been proven to be limited in scope (generally applicable to proprietary business, trade and technical schools only) and generally ineffective because of lack of State funding to conduct full scale initial and follow-up evaluations. The United States has no Federal Ministry of Education or other centralized authority exercising single national control over postsecondary educational institutions in this country. The States assume varying degrees of control over education, but, in general, institutions of higher

education are permitted to operate with considerable independence and autonomy. As a consequence, American educational institutions can vary widely in the character and quality of their programs.

In order to ensure a basic level of quality, the practice of accreditation arose in the United States as a means of conducting non-governmental, peer evaluation of educational institutions and programs. Private educational associations of regional or national scope have adopted criteria reflecting the qualities of a sound educational program and have developed procedures for evaluating institutions or programs to determine whether or not they are operating at basic levels of quality. (U.S. Department of Education)

Types of Accreditation

Institutional accreditation normally applies to an entire institution, indicating that each of an institution's parts is contributing to the achievement of the institution's objectives, although not necessarily all at the same level of quality. The various commissions of the regional accrediting associations, for example, perform institutional accreditation, as do many national accrediting agencies.

Specialized or programmatic accreditation normally applies to programs, departments, or schools that are parts of an institution. The accredited unit may be as large as a college or school within a university or as small as a curriculum within a discipline. Most of the specialized or programmatic accrediting agencies review units within an institution of higher education that is accredited by one of the regional accrediting commissions. However, certain accrediting agencies also accredit professional schools and other specialized or vocational institutions of higher education that are free-standing in their operations. Thus, a "specialized" or "programmatic" accrediting agency may also function in the capacity of an "institutional" accrediting agency. In addition, a number of specialized accrediting agencies accredit educational programs within non-educational settings, such as hospitals. (U.S. Department of Education)

Types of Accrediting Organizations

Regional accrediting organizations operate in six different regions of the country and review entire organizations, 98 percent or more of which are both degree-granting and nonprofit. Regional organizations may also accredit non-degree, for-profit institutions, but this is a rare occurrence.

National accrediting organizations operate throughout the country and review entire institutions. Of the nationally accredited institutions, 34.8 percent are degree-granting and 65.1 percent are non-degree-granting. 20.4 percent are nonprofit and 79.5 percent are for-profit. Many are single purpose institutions (i.e. information technology or business) and some are faith based.

Specialized accrediting organizations operate throughout the country and review programs and some single-purpose institutions. There are more than 17,600 of these accredited programs and single-purpose operations. (Council on Higher Education Accreditation)

Recognized Accrediting Organizations

There are no laws regarding the development or operation of an accrediting organization. Therefore, some are considered more legitimate than others. Similar to "diploma mills" there are some organizations considered "accreditation mills" that will accredit institutions for a fee without the utilization of what is generally considered acceptable standards.

There are two organizations that are currently considered to “recognize” legitimate accrediting agencies, the U.S. Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA). For USDE recognition, accreditation from the organization is used by an institution or program to establish eligibility to participate in federal student aid or other federal programs. The Council for Higher Education Accreditation is a private nongovernmental coordinating agency for accreditation. As defined by CHEA, it is “A national advocate and institutional voice for self-regulation of academic quality through accreditation...” Individual accrediting organizations may be “recognized” by CHEA, the U.S. Department of Education, or both.

Quality

The term “quality” is used by multiple organizations however, it is rarely defined. For the purposes of this document, “quality” will refer to meeting or exceeding a minimum set of standards. A functional reality of this definition is that the establishment of the designation “quality” is dependent on the minimum standards of the organization performing a review. While an institution may be considered of quality by one organization, it may not meet the designation of quality by a different organization using a different set of standards.

Section Purpose

The purpose of this section of the testimony is not to portray either State Approving Agencies or accrediting organizations as having more or less value than the other. Each serves a purpose in relationship to the educational community. However, the value of each differs in terms of mission, standards, and purpose. State Approving Agencies and accreditation organizations each have a function, but the functions are not duplicative. State Approving Agency approval and accreditation are complimentary, not identical, processes.

To assist in gaining a better understanding of what accreditation is and is not, the following excerpts from a book entitled Understanding Accreditation by Kenneth E. Young, et.al. are reprinted. Dr. Young was the founding President of the Council on Postsecondary Accreditation, the former umbrella organization for accrediting associations.

“Accreditation is a process by which an institution of postsecondary education evaluates its educational activities and seeks an independent judgment to confirm that it substantially achieves its objectives and is generally equal in quality to comparable institutions or specialized units. Essential elements in the accreditation process are (1) a clear statement by the institution of its education intentions, (2) the conduct of a directed self-study focused on the achievement of these intentions, (3) an on-site evaluation by a selected group of peers, and (4) a decision by an independent accrediting commission (comprised of fellow educators) that, in light of its standards, the institution or specialized unit is worthy of accreditation. The accreditation process is designed primarily to encourage and assist the institution to evaluate itself objectively and then for the accrediting body to validate what the institution has said about itself.

Institutional accreditation (1) deals with the total institution, (2) is almost always the basis for institutional membership, and (3) focuses primarily on institution-wide objectives, processing, and outcomes”.

The major characteristics of accreditation are the following:

1. It is predominantly a voluntary, private-sector activity and therefore cannot mandate compliance or control behavior except by persuasion and peer influence.
2. It is the premier example of self-regulation (as opposed to government regulation) in postsecondary education.

3. It focuses primarily on judging educational quality – an elusive concept – and, given the great diversity of postsecondary educational institutions in the United States, criteria tend to be general and variable.
4. It functions essentially as an evaluative process, and institutional self-study is at the heart of the process, and
5. It provides outside consultation, closely tied to the institution's own research and planning.

To understand what accreditation is not is also important. Accreditation is not governmental, although both federal and state agencies use it—to determine eligibility for certain government programs and in relation to professional licensing. It is not mandatory, although there are strong social and political pressures and even some legal prods to encourage participation. It is not a rating system, although institutions and programs generally do get compared. It is not a mechanism for formally policing institutional behavior; accrediting bodies do not have to assess compliance, even if they wanted to. Rather, it depends on informal monitoring, generally through the accrediting body following up on a complaint about an institution (usually from an unhappy faculty member or student, another institution or state agency). It does not deal directly with credits, despite its name, although it is often used to help distinguish (sometimes erroneously) between worthy and unworthy prior educational experiences. And it is not a stamp of approval on individual students or courses; it does not operate at that level of analysis, although it is often perceived that way.

The public is often led to believe that accreditation forces compliance on institutions. Although colleges and universities are certainly expected to comply with the policies, procedures, and requirements established by the accrediting body to maintain membership, the value and effectiveness of the entire process nevertheless lies in the institution's own commitment to excellence and continuous self-study and evaluation. The public has little understanding of the voluntary nature of accreditation and the fact that compliance guarantees are not systematically built in. Indeed, any guarantees reside in the individual institution's seriousness of purpose and its sincerity."

In summary, other speakers at this hearing today already have or will address the DOE process for Title IV eligibility and the role of accreditation in that process so our testimony will not go into greater detail. However, we believe that it is important to restate that the major differences between SAAs and accreditation lie (1) in their mission, standards, and purpose and (2) operationally in the depth, breadth and frequency of their reviews. They each have a function, but the functions are not identical or duplicative – they are complimentary. The SAA process is a governmental quality control mechanism while accreditation is a private sector quality enhancement process.

Apprenticeship and Other on-the-job training

The distinctions between the work of SAAs and the federal Department of Labor on the approval of apprenticeship and other on-the-job training (OJT) programs also can be described as complimentary. The additional work by SAAs with Registered Apprenticeship Programs is almost exclusively connected to the specific requirements of Title 38, U.S. Code pertaining to the payment of VA benefits.

Unregistered apprenticeship and OJT programs are another matter. For the vast majority it is only the SAA that works with the program sponsor to review what is to be taught/learned, by whom, with what expertise, with what resources and under what circumstances. This is in addition to insuring that the requirements of Title 38 are also being met.

D. Funding

The total annual allocation for SAA activities is stipulated in Title 38. The annual share of the allocation awarded to each SAA is determined by a formula essentially based upon the number of active schools and training establishments being supervised. The total annual allocation was capped at 12 million dollars from 1989 to 1994. In 1995, the cap was increased to 13 million dollars until 2001, when it is being raised to 14 million dollars. From 2004 thru 2005, the cap was raised to 18 million dollars and for 2006 thru 2007 it was raised to 19 million dollars. **If no action is taken, in 2008 the cap will revert back to 13 million dollars --- a 32 percent cut!**

- The SAAs are periodically in a state of uncertainty. Without either the ability to carry-over funds from one year to the next or to rely on an annual cost of living adjustment, prudent planning is not possible.
- SAAs/ States need funding stability in order to plan for and execute activities that meet the requirements of law and the contract between the State and the VA. Many SAAs are comprised of one full time professional staff person – some have only a part time person. Program approval and monitoring activities, especially those associated with apprenticeship and other on-the-job training programs, require expertise and timely action. Unstable funding does little to support this.
- In order to provide an acceptable level of service to veterans, the Congress, and the DVA and to continue to take on additional roles as needed, SAAs must be consistently funded at an adequate level. Once restored to the current level of \$19 million, the amount should be adjusted each year by the government-approved COLA applied to other benefit programs.

In summary, SAAs make major contributions to the success of the various GI Bills in many ways. These contributions far exceed the proportionate amount of funds received by the Agencies when compared to the amount of benefits provided to veterans and other GI Bill eligible persons. The contributions include, but are not limited to, the following:

- determinations regarding the quality and integrity of just about any kind of learning experience imaginable (institutional, job training, flight, correspondence, etc.);
- work with employers to develop and enroll veterans in job training programs;
- assessments of tests for professional and occupational licensing and certification;
- training of VA Certifying Officials at educational institutions and job training establishments;
- briefings during transition assistance programs and retirement seminars, mailings to recently discharged veterans and Selected Reserve personnel, and other outreach activities to increase the utilization of the GI Bills;
- providing advice and guidance directly to veterans and other GI Bill eligible persons and indirectly through educators, trainers and others who counsel veterans;
- serving as the gatekeepers for the “GI Bill” and advocates for veterans at the state and local levels;
- assisting the federal government to eliminate waste, fraud and abuse; and,
- state based SAAs provide local insights to the Congress and the VA on revisions to law that would better help to meet the education and training needs of veterans.

CLOSING

In closing, Madame Chairwoman, we would like to thank you and members of the Subcommittee again for the opportunity to comment on the functions of State Approving Agencies (SAAs), the value added by SAAs, the issue of overlap in the work of various “approving agencies” and funding needed by SAAs to carry out their responsibilities so that the GI Bill remains the country’s premier educational assistance program bar none. Mr. Sweeney and I would be happy to respond to any questions that you might have.